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B-140300
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UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

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MANPOWER AND WELFARE
DIVISION

RELEASED

NOV 15 1974

B-140300

The Honorable William M. Ketchum
House of Representatives

Dear Congressman Ketchum:

Your April 5, 1974, letter expressed concern about the protracted delays veterans attending college from your district were experiencing in receiving their GI Bill educational assistance checks from the Veterans Administration (VA) and the personal hardships caused by such delays.

As discussed with you in our April 30, 1974, meeting, we plan to initiate a review of the effectiveness of VA's efforts to improve the timeliness of educational assistance checks. Summarized below is the information currently available to us on the causes of check delays and VA's corrective action.

REASONS FOR DELAYS

It appears that most of the problems regarding delays occurred after Public Law 92-540 was enacted on October 24, 1972, which authorized advance payments under VA educational programs. The amount of the advance payment covers the first 2 months of training. This provision was effective August 1973 with the beginning of the fall enrollment period.

Application for advance payment could be made directly to VA or through the schools. VA did not have information on the number of students who applied for advance payments last year. It did know, however, that as of November 16, 1973, checks totaling about \$148.5 million had been issued to 418,794 advance payment applicants. VA has stated that less than 3 percent of the more than 400,000 students who had received advance payments and subsequently enrolled in training had experienced a 2-week delay or more in receiving their regular monthly checks.

VA reviewed students' applications for advance payments, and if the students were deemed eligible the Treasury Department was authorized to prepare and mail the advance payment checks to the schools of proposed enrollment. The

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schools were instructed to hold the checks for delivery directly to the students at the time of registration.

According to VA, various circumstances delayed advance payment checks. For instance, in many cases certain local postmasters returned checks, refusing to deliver them to anyone other than the student whose name had been printed above the school's name and address on the Certificate of Delivery card which accompanied each check.

Some checks were sent to the wrong schools because either VA had made mistakes or the students had changed schools without timely notifying VA.

Delays also occurred when some schools failed to promptly return a completed Certificate of Delivery card to VA for each advance payment check delivered to a student. In these cases, VA delayed issuing subsequent monthly assistance checks until it received the certification cards.

In addition, students' failure to submit appropriate certification forms to VA on time for processing caused regular monthly check delays.

VA CORRECTIVE ACTIONS

VA said to resolve the problems of local postmasters returning advance payment checks, the Certificate of Delivery card was changed so that the school's name appeared on the first two address lines. The payee's name, preceded by the word "for," was printed on the third address line. In addition, the postal service was contacted and a postal bulletin was issued to all postmasters advising them of the statutory requirements to deliver advance payment checks to the schools.

VA's Department of Veterans Benefits (DVB) has also issued circulars to all regional offices containing a list of additional actions being taken to improve the timeliness of educational assistance checks for the fall 1974 school year. (See encs. I and II for DVB Circulars 20-74-40 and 20-74-42.)

One of the major VA actions is the placement of trained veterans representatives (VET REPS) directly on the college or university campus. VET REPS will supervise the delivery of advance payment checks to the students and will act as

"trouble shooters" for VA regional offices in processing needed documents, serve as liaisons to veterans groups on campus, counsel veterans, and consult with college or university officials and faculty on VA matters.

As of August 1, 1974, VA had appointed 1,327 VET REPS to serve about 2,700 campuses. These VET REPS are to be assigned on the basis of the total veteran enrollment at each school. VA's assignment formula provides for a VET REP to be on campus 1 day a week throughout the academic year for every 100 enrolled veterans. Thus, if a school has 500 veterans enrolled, a VET REP will be on campus 5 days a week. For schools with less than 100 enrolled veterans, itinerant service involving on-campus visits 1 or 2 days each month will be provided.

In addition to using VET REPS on campus, VA has initiated the following changes effective the fall 1974 school enrollment period.

- Veterans and other eligible persons attending school on at least a half-time basis will be enrolled by VA for the complete degree or course training period, and benefit awards will be for a similar period unless earlier termination is required either because the student's benefits have been exhausted or he has reached his delimiting date for using educational assistance benefits. By eliminating its previous requirement that the school certify the student for benefits each school period, VA believes it will significantly reduce the likelihood of delayed payments because nonreceipt of the previously required certification document will not automatically bar issuance of the assistance checks.
- Failure to return the advance payment Certification of Delivery card by the due date will now cause a computer-generated message to be sent to the appropriate VA regional office to determine the beneficiary's enrollment status, instead of automatically terminating the educational assistance checks.
- Direct and continuing liaison will be maintained between school officials, veterans, eligible persons, and VA to promptly resolve "no payment" and/or improper payment cases.

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We plan to review the appropriateness and effectiveness of these VA actions.

As you requested, we will keep you advised of VA's progress in this area and will provide you with a copy of any report we may issue on the results of our review.

The information in this report has been discussed with officials of VA's Department of Veterans Benefits. Their comments and suggested changes were most helpful in preparing the report.

We plan to send VA a copy of this report. We will not distribute this report further unless you agree or publicly announce its contents.

Sincerely yours,

Gregory J. Ahart
Director

Enclosures - 2

Department of Veterans Benefits
Veterans Administration
Washington, D. C. 20420

DVB Circular 20-74-40

May 7, 1974

EDUCATION PAYMENTS

1. The education payment procedures for veterans and eligible persons enrolled in institutional courses will be changed by fall enrollment 1974. The changes that are announced in this publication are intended to result in:

- a. Timely payment of educational assistance allowance;
- b. Improved liaison and public relations with veterans and school officials;
- c. Prompt notification to the VA and resolution of nonpayment or improper payment cases by the VA;
- d. Timely outreach action with veterans who drop out of school.

2. The changes will provide that:

- a. Advance payment will be authorized if information is timely received without any specific request for advance payment from the veteran or eligible person;
- b. Enrollment of veterans and eligible persons attending on at least a half-time basis will be for the complete degree or course, and awards will be for a like period unless earlier termination is required because of delimiting date or expiration of entitlement;
- c. Failure to return a VA Form 22-1999V, Certification of Delivery of Advance Payment and Enrollment, will cause a message to be generated to the regional office to determine the enrollment status, instead of terminating payments retroactively;
- d. Veterans Benefits Counselors will be stationed at colleges and universities having a sizable enrollment of veterans and eligible persons to serve as a liaison between the school (officials and eligible students) and the regional office, and to perform other veterans assistance functions;

DVB Circular 20-74-40

May 7, 1974

e. VA Form 22-6553, Certification of Pursuit of Course Leading to a Standard College Degree, will be eliminated for eligible students enrolled in college-level programs if the award is for an enrollment of 3 months or less, or if the entire payment is due at the time the award is processed. When required, the certificates will be sent to the school for completion by a VA employee on campus. Other arrangements will be made when there is no VA employee on campus. (No bar will be set, but computer control will be established at DPC Hines.) (Installation date for the change in certification procedures will be announced later.);

f. A delinquent VA Form 22-6553 for a prior enrollment period at the college level will not bar payment for a new enrollment period in a college-level program;

g. VA Form 22-6553a, Monthly Certification of Attendance for Courses Not Leading to a Standard College Degree and Farm Cooperative Courses, will be required quarterly rather than monthly. (Installation date for this change will be announced later.);

h. Direct and continuing liaison will be maintained between school officials, veterans and eligible persons and VA employees to promptly resolve "no payment" and/or improper payment cases.

3. Each regional office should now begin liaison work with schools in preparation for the fall enrollment period. The only changes that will affect the enrollment certification procedures for schools are listed in paragraph 2a and b above. These two items should be brought to the attention of the school officials so that they can complete and submit the enrollment and reenrollment certifications at the earliest possible date. The preprinted reenrollment certifications will be distributed to schools from DPC Hines in May 1974. The two additional items that will be needed to enroll the eligible student for the complete course are:

- a. Expected date of graduation; and
- b. Whether the student will attend continuously, including each summer session, or will attend during specified terms only. The school may provide this information by one of two methods. The dates for each enrollment period during the remainder of the student's course to graduation may be included, or the school may enter the enrollment period that

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the student will attend during the next year and add a statement to show expected date of graduation. Schools should also be cautioned not to enter the information on any part of the form that is to be completed by the VA for scan purposes.

4. School officials should be assured that the risk of being held liable for an overpayment under title 38, U. S. Code, section 1785, is no greater when enrolling for a complete course than it has been under prior enrollment procedures. No school will be held liable for an overpayment based on a certificate that was accurate at the time it was made, if the school reports changes that occur as they come to the attention of the school officials. This takes into account the fact that many colleges and universities no longer maintain attendance records and, therefore, may have no knowledge that a student changes his or her status until the end of the term.

5. Detailed instructions and procedures will follow as appendixes:

- a. Appendix A - Adjudication Procedures.
- b. Appendix B - Finance Procedures.
- c. Appendix C - Veterans Services (Assistance) Procedures.


ODELL W. VAUGHN
Chief Benefits Director

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NOTE: THIS CIRCULAR REPRINTED TO PROVIDE DISTRIBUTION TO
VROC, 1 each.

Department of Veterans Benefits
Veterans Administration
Washington, D. C. 20420

DVB Circular 20-74-42
(Confirming Teletype
Transmission)
May 6, 1974

VA ON-CAMPUS PROGRAM

1. Under jurisdiction of Veterans Services Divisions an on-college and university campus program will be established to provide assistance to Vietnam era veterans and provide needed liaison with school officials.
2. This on-the-scene service will be provided by assignment of full-time Contact Representatives organizationally designated as Veterans Education and Training Representatives (Vet Rep). Full range of Contact Representative duties and responsibilities will be performed with special emphasis on the functions described below (which may be attached to existing position descriptions as an Addendum): "Incumbent serves as veterans education and training representative (Vet Rep) on campuses of institutions of higher learning, representing the VA on all matters or subjects under VA jurisdiction and emphasizing the following:
 - a. Answers complex questions relating to VA educational assistance benefits and takes action to resolve individual payment inquiries where information from the VA regional office is needed before an answer is given;
 - b. Assures correctness and proper handling of applications, completion of required certifications of attendance and submission of required information in support of a claim for benefits;
 - c. Maintains liaison with school officials through regular contact and discussion of VA educational assistance;
 - d. Supervises the delivery of advance payment checks, resolves check problems and promptly takes action to prevent or reduce overpayments by taking immediate corrective action;
 - e. Counsels veterans indicating an intent to stop schooling, to motivate their continuance and citing assistance avenues available, i.e., tutorial assistance, etc.; (See GAO note, p. 7.)
 - f. Conducts outreach to campus community, locating school dropouts, and endeavoring to get veterans back in school; (See GAO note, p. 7.)

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- g. Coordinates VA matters with on-campus veterans groups, providing briefings in salient subjects;
- h. Maintains liaison with campus news media to alert veterans of changes in law, procedures or VA policies;
- i. Assists veterans in providing necessary documentation relative to changes in status-- marriage, birth, etc.--which affect benefit payments, or with changes in program, address, etc.;
- j. Provides guidance and support to work-study personnel assigned to the campus."

3. We contemplate that journeyman level of GS-9 will eventually be appropriate in most locations. Lower grade level positions may be established for assignments not reflecting full range of duties and responsibilities and supervisory or incharge positions may be established where required.

4. Imperative that immediate steps be taken to identify and select fully qualified individuals for assignment to these positions. Although we anticipate that significant number of these new positions will be filled from among on-duty employees, it is recognized that aggressive recruitment action will be required to either replace employees selected for such assignments or for direct assignment to these positions. Whatever the source may be, we must assure that those selected to work on campus are knowledgeable, capable of effectively communicating and establishing empathic relationships with Vietnam era veterans, and properly motivated to be fully responsive to veterans whom they serve. In seeking out candidates from outside the VA, maximum efforts will be made to recruit suitably qualified Vietnam era veterans. Timetable calls for employees to be physically present at their duty stations (on the campuses) by early August, preferably about August 1. Recruiting, therefore, must begin immediately so the months of May and June will be productive in filling these positions and in bringing new employees on duty during these months in order that appropriate training can be completed on timely basis. Although not all inclusive, the following recruitment and placement sources are suggested:

- a. Many positions may be filled under your station promotion plan or through other inservice placement actions. You should publicize these opportunities to employees so those qualified

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and interested may apply. In addition, it may be necessary to seek out highly qualified individuals and encourage their acceptance of these assignments.

b. In making requests for certificates from FSEE register, follow the provisions of DVB Circular 20-74-34, dated April 19, 1974. Requests for certification at GS-8/9 levels from mid-level register will also include request for certification based on Vietnam era service as a quality ranking factor (SF 39A not required).

c. Individuals on college campuses now engaged in full-time work with veterans and their problems should not be overlooked as source of candidates.

d. Other sources of candidates include state employment offices, local VA non-DVB stations, contacts with service organizations, business and community leaders, minority groups, military separation centers, etc. (Division program employees should participate with the personnel officer in this effort, particularly when making community and service organization contacts.)

e. As deemed appropriate, make arrangements with your area information representative to get public service time and to develop other appropriate means of communicating these efforts to improve services to veterans (staffing needs could be woven into such releases).

5. Civil Service Commission has committed their full cooperation and priority service in meeting these needs. Generally, Commission expects to respond to requests for certification within 24 hours of receipt of properly completed SF 39. Name requests may require additional time. If adequate number of Vietnam era veterans not available on registers, Commission will make arrangements for prompt testing of FSEE candidates, local scoring of test papers, and immediate certification of eligibles.

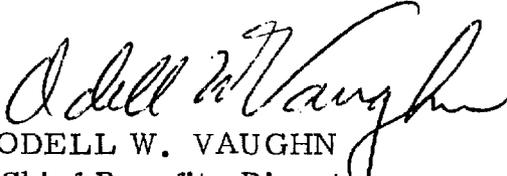
6. Comprehensive training of these employees is of vital importance. Appropriate training at each field station should be given to both new and on-duty employees selected for these positions as soon as possible

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following their selection. In addition, a comprehensive centralized training program to be conducted at four sites during the month of July is being planned. You will be kept informed as these plans progress.

7. Prior to local implementation, in accordance with MP-5, part I, chapter 711, stations with exclusively recognized labor organizations should confer with these organizations concerning impact this program may have on employees they represent.
8. Keep your field Director informed of significant progress in staffing these positions and about any management problems you may encounter. Technical assistance or resolution of any delays in service by Civil Service Commission may be obtained by calling the Office of Personnel on 202-389-3725.
9. RESCISSION: This Circular is rescinded July 1, 1975.


ODELL W. VAUGHN
Chief Benefits Director

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GAO note: VA subsequently modified this circular to indicate that the VET REPs will only perform the services in items 2.e. and f. on those campuses where such services are not provided through a Veterans Cost of Instruction Program funded by the Department of Health, Education, and Welfare.